

Andy Fairey
Chief Operating Officer
Charleston Water System
103 St. Philip Street
Charleston, SC 29402

July 31, 2013

Via Email – gillesjl@dhec.sc.gov

Jason Gillespie
Water Quality Standards Coordinator
SC DHEC
2600 Bull Street
Columbia, SC 29201

Re: R. 61-68 Definition # 29. Change as part of triennial review

Jason,

Thank you for taking the time to speak with me this morning. I appreciate you considering this request as part of the 2013 Triennial Review at this late hour.

As I described, this is a small item that came up as Charleston Water System is working with the Agency to re-issue our NPDES Permit. As definition # 29 is currently written in R. 61-68, it does not align with EPA's use of geometric means with bacteria standards through out years of research and regulation.

Here is the definition as it is currently written in 61-68.

29. Daily maximum (for bacterial indicators only) means the highest arithmetic average of bacterial samples collected [for each of the bacterial indicator species (i.e., *E. coli*, enterococci, and/or fecal coliform)] in any 24 hour period during the calendar month.

I've also included the definition for the Monthly average, which does make use of the geometric mean.

42. Monthly average (for bacterial indicators only) means the calendar month (i.e., 28 days, 29 days, 30 days, or 31 days) geometric mean of all bacterial samples collected [for each of the bacterial indicator species (i.e., *E. coli*, enterococci, and/or fecal coliform)] during the calendar month.

I would propose this definition for the daily maximum:

29. Daily maximum (for bacterial indicators only) means ~~the highest arithmetic average~~ **geometric mean** of bacterial samples collected [for each of the bacterial indicator species (i.e., *E. coli*, enterococci, and/or fecal coliform)] in any 24 hour period during the calendar month.

I recognize that the Agency is making an allowance by evening allowing the averaging of bacterial samples collected within a 24 hour period, and I appreciate the flexibility that allows. But if we can get the geometric mean inserted in place of the arithmetic average, I believe that would be a more sound scientific position and in alignment with existing EPA requirements.

As I mentioned at the start of this e-mail, this is a small item. If you think it is too small to bother with, just say so and I am willing to live with that. I greatly appreciate you running it up the flag pole at this late date. If I can provide further information or documentation supporting the change, please let me know.

Best Regards,

Andy Fairey